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Attorney for Plaintiff
MOBILE TELECOMMUNICATIONS
TECHNOLOGIES, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MOBILE TELECOMMUNICATIONS
TECHNOLOGIES LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC., SAMSUNG
TELECOMMUNICATIONS AMERICA,
LLC.,

Defendants.

Case No.:

**ADMINISTRATIVE MOTION TO FILE
UNDER SEAL IN RE PLAINTIFF
MOBILE TELECOMMUNICATIONS
TECHNOLOGIES, LLC'S MOTION TO
COMPEL THIRD-PARTY GOOGLE,
INC. TO PRODUCE DOCUMENTS AND
TO MAKE AVAILABLE AN
ADDITIONAL WITNESS AND
REQUEST FOR SANCTIONS
PURSUANT TO FRCP 37**

1 Pursuant to Civil Local Rules 79-5(d)-(e), Plaintiff Mobile Telecommunications
2 Technologies, LLC (“MTel”) submits this administrative motion to file under seal certain
3 documents associated with MTel’s Motion to Compel Third-Party Google, Inc. to Produce
4 Documents and to Make Available an Additional Witness, filed today.

5 This motion is supported by the January 8, 2016 Declaration of Craig S. Jepson
6 (“Jepson Declaration”), submitted concurrently herewith as required by Local Rule 79-
7 5(d)(1)(A).

8 1. MTel seeks to seal the highlighted portions of the unredacted version of Plaintiff
9 Mobile Telecommunications Technologies, LLC’s Motion to Compel Third-Party Google, Inc.
10 to Produce Documents and to Make Available An Additional Witness And Request for
11 Sanctions Pursuant to FRCP 37.

12 2. MTel seeks to seal the entirety of excerpts from the November 11, 2015,
13 deposition of Google corporate representative Franceso Nerieri, filed provisionally under seal as
14 **Exhibit 4** to the Declaration of Craig S. Jepson.

15 3. MTel seeks to seal the entirety of the document “GCM Protocol,” filed
16 provisionally under seal as **Exhibit 5** to the Declaration of Craig S. Jepson.

17 4. MTel seeks to seal the highlighted portions of the unredacted version of Mobile
18 Telecommunications Technologies, LLC’s Notice of 30(B)(6) Deposition of Google, Inc., filed
19 provisionally under seal as **Exhibit 7** to the Declaration of Craig S. Jepson.

20 5. MTel seeks to seal the entirety of the December 9, 2015 correspondence to Ms.
21 Andrea Roberts, filed provisionally under seal as **Exhibit 8** to the Declaration of Craig S.
22 Jepson.

23 6. MTel seeks to seal the highlighted portions of the unredacted version of Third
24 Party Google, Inc.’s Response to Mobile Telecommunications Technologies, LLC’s November
25 25, 2015 Subpoena for Deposition and Documents., filed provisionally under seal as **Exhibit 9**
26 to the Declaration of Craig S. Jepson.

1 DATED: January 11, 2016

Respectfully submitted,
REED & SCARDINO LLP

3 By: /s/ Craig S. Jepson
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